

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CLINGMAN & HANGER
MANAGEMENT ASSOCIATES, LLC,
as Trustee of the Furie Litigation Trust,
Plaintiff,

V.

KAY RIECK; LARS DEGENHARDT;
THEODOR VAN STEPHOUDT; DAVID
HRYCK, REED SMITH LLP; THOMAS
E. HORD; MICHAEL ANTHONY
NUNES; STONE PIGMAN WALTHER
WITTMAN LLC, in its own capacity and
as successor by merger to COGAN &
PARTNERS LLP; DAVID ELDER;
BRUCE GANER; SIERRA PINE
RESOURCES INTERNATIONAL, INC.;
and HELENA ENERGY, LLC,
Defendants.

[illegible]

Civil Action No. 4:21-cv-02698

**DEFENDANTS DAVID HRYCK AND THEODOR VAN STEPHOUDT’S
UNOPPOSED MOTION TO EXTEND TIME TO ANSWER**

TO THE HONORABLE CHARLES R. ESKRIDGE III:

Defendants David Hryck and Theodor Van Stephoudt (“Defendants”), respectfully request an extension of time to October 1, 2021 to answer, move, or otherwise respond to Plaintiff’s state-court petition which was removed to this Court in the above-styled and numbered civil action.

Plaintiff filed Plaintiff's Original Petition ("Petition") on August 6, 2021, and it was assigned to the 334th District Court of Harris County, Texas. Defendants are residents of New York. Substitute service on the Texas Secretary of State occurred on August 16,

2021, and the case was removed to this Court on August 18, 2021. Thereafter, on August 30, 2021, Defendant received by certified mail copies of the Petition and the process received by the Secretary of State.

The returns of service are on file with this Court (Dkt Nos. 3 and 8), and the current deadline for Defendants to answer is **September 7, 2021**. *See* Fed. R. Civ. P. 81(c)(2)(A).

Due to the complexity of the matters at issue and the need for additional preparation time, Defendants respectfully request an extension of time—to **October 1, 2021**—to file an answer, move, or otherwise respond to the Petition.

Plaintiff does not oppose this extension.

WHEREFORE, premises considered, Defendants David Hryck and Theodor van Stephoudt respectfully request that the Court extend their deadline to answer, move, or otherwise respond to Plaintiff's lawsuit to October 1, 2021.

DATED: September 3, 2021

Respectfully Submitted,

GIBBS & BRUNS LLP

/s/ Barrett H. Reasoner

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***Counsel for Defendants
David Hryck and
Theodor van Stephoudt***

CERTIFICATE OF CONFERENCE

I hereby certify that prior to filing the above Unopposed Motion to Extend Time to Answer, the undersigned conferred with opposing counsel, Robert Corn, regarding the relief sought in this Motion. He is unopposed to the requested extension of time.

/s/ Ayesha Najam
Ayesha Najam

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above David Hryck and Theodor Van Stephoudt's Unopposed Motion to Extend Time to Answer has been served on the following counsel/parties of record in accordance with Fed. R. Civ. P. 5 and local rules for electronic filing and service on this 3rd day of September 2021:

Robert M. Corn, Counsel for Plaintiff
George M. Kryder, III, Counsel for Stone, Pigman, Walther, Wittman, LLC
William P. Haddock, Counsel for Helena Energy, LLC

/s/ Barrett H. Reasoner
Barrett H. Reasoner